

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INVENSAS CORPORATION and TESSERA)	
ADVANCED TECHNOLOGIES, INC.,)	
)	Civil Action No. 19-cv-861-RGA
Plaintiffs,)	
)	
v.)	
)	
NVIDIA CORPORATION,)	
)	
Defendant.)	

**DECLARATION OF MICHAEL E. BOWLUS IN SUPPORT OF
PLAINTIFFS' MOTION FOR LEAVE TO AMEND THE COMPLAINT**

I, Michael E. Bowlus, declare as follows:

1. I am an attorney licensed to practice in the State of California. I am an associate of Covington & Burling LLP, counsel for Plaintiffs Invensas Corporation and Tessera Advanced Technologies, Inc. I have personal knowledge of the facts set forth below, and if called upon to testify as to those facts, I could and would testify competently thereto.

2. Attached as Exhibit 1 is a true and accurate copy of Plaintiffs' proposed First Amended Complaint, including exhibits thereto.

3. Attached as Exhibit 2 is a true and accurate redline comparison of Plaintiffs' proposed First Amended Complaint against Plaintiffs' original complaint (D.I. 1).

4. Attached as Exhibit 3 is a true and accurate copy of excerpts from Plaintiffs' First Set of Requests for Production of Documents and Things to NVIDIA Corporation, Nos. 1–114.

5. Attached as Exhibit 4 is a true and accurate copy of excerpts from Plaintiffs' First Set of Interrogatories to NVIDIA Corporation, Nos. 1–14.

6. Attached as Exhibit 5 is a true and accurate copy of excerpts from NVIDIA Corporation's Responses and Objections to Plaintiffs' First Set of Requests for Production, Nos.

1–114.

7. Attached as Exhibit 6 is a true and accurate copy of excerpts from NVIDIA Corporation’s Responses and Objections to Plaintiffs’ First Set of Interrogatories, Nos. 1–14.

8. Attached as Exhibit 7 is a true and accurate copy of a letter dated October 1, 2019 sent by Mr. Thomas Garten, counsel for Plaintiffs, to counsel for NVIDIA Corporation.

9. Attached as Exhibit 8 is a true and accurate copy of an email sent by Mr. Garten to counsel for NVIDIA Corporation, Ms. Carrie Williamson, on October 16.

10. Attached as Exhibit 9 is a true and accurate copy of an email sent by Ms. Williamson to Mr. Garten on October 30.

11. Attached as Exhibit 10 is a true and accurate copy of an email sent by Ms. Laurie Ouchida, a case manager for NVIDIA’s counsel, to Plaintiffs’ counsel on November 27.

12. Attached as Exhibit 11 is a true and accurate copy of an email sent by Mr. Garten to Ms. Williamson on December 5.

13. Attached as Exhibit 12 is a true and accurate copy of an email sent by Ms. Williamson to Mr. Garten on December 10.

14. Attached as Exhibit 13 is a true and accurate copy of an email sent by Mr. Garten to Ms. Williamson on December 18.

15. Attached as Exhibit 14 is a true and accurate copy of an email sent by Ms. Williamson to Mr. Garten on December 22.

16. Attached as Exhibit 15 is a true and accurate copy of an email sent by Ms. Ouchida to Plaintiffs’ counsel on January 17, 2020.

17. Attached as Exhibit 16 is a true and accurate copy of an email sent by Ms. Ouchida to Plaintiffs’ counsel on February 6.

18. Attached as Exhibit 17 is a true and accurate copy of excerpts from NVIDIA Corporation's Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories, Nos. 3, 5, 6, 13.

19. Attached as Exhibit 18 is a true and accurate copy of an email sent by Ms. Williamson to Mr. Garten on April 8.

20. Attached as Exhibit 19 is a true and accurate copy of an email sent by Mr. Garten to Ms. Williamson on April 8.

21. Attached as Exhibit 20 is a true and accurate copy of an email sent by Ms. Williamson to Mr. Garten on April 13.

22. Attached as Exhibit 21 is a true and accurate copy of U.S. importation records obtained by Plaintiffs from a private subscription service.

23. Attached as Exhibit 22 is a true and accurate copy of an email sent by Mr. Garten to Ms. Williamson on June 3.

24. Attached as Exhibit 23 is a true and accurate copy of an excerpt from NVIDIA Corporation's 2019 Form 10-K.

25. Attached as Exhibit 24 is a true and accurate copy of an email sent by Mr. Asa Wynn-Grant, counsel for NVIDIA Corporation, to Mr. Garten on May 6.

26. Attached as Exhibit 25 is a true and accurate copy of an email sent by Mr. Wynn-Grant to Mr. Garten on May 7.

I declare under penalty of perjury that the foregoing is true and accurate, and that this declaration was executed in San Francisco, California, on June 10, 2020.

/s/ Michael E. Bowlus
Michael E. Bowlus